

5/017/0031

SPILL PREVENTION CONTROL AND COUNTERMEASURES (SPCC) PLAN

for

**Bromide Mining - Hanksville
28 East 100 North
Hanksville, Utah 84734**

**And
Hendry Mountains operation.**

RECEIVED

NOV 02 2015

Div. of Oil, Gas & Mining

Designated Person Accountable for Spill Prevention:

(update as appropriate)

**All update that have taken place will be documented in blue ink and was done by Shane Scott
Appointed General Manager of all Facility's Hanksville and operation areas:**

| Name | Phone |
|---|--|
| <u>Shane Scott (Facility Manager)</u> Shane Scott (General Manager) | 305-812-8312 cell 435-542-2801 office 435-542-1903 Direct Office. |
| <u>Jody Squires</u> | <u>775 304 7334</u> |
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This SPCC plan has been prepared in accordance with the most recent Code of Federal Regulations 40 CFR 112-Oil Pollution Prevention. Implementation of the plan is the responsibility of Bromide Mining

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Introduction

The following Spill Prevention Control and Countermeasure (SPCC) Plan has been developed in accordance with good engineering practices and in accordance with federal regulations 40 CFR Part 112. The plan has been prepared in similar format to EPA's sample SPCC plan found in their 2013 SPCC Guide for Regional Inspectors¹.

The purpose of this Spill Prevention, Control, and Countermeasure (SPCC) Plan is to describe measures implemented by Bromide Mining to prevent oil discharges from occurring, and to prepare Bromide Mining to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge. For all emergencies, including oil spills, Bromide Mining managers and assistant managers have been instructed to contact the facility manager or the company environmental coordinator who will assist in response, reporting and clean up as necessary. .

In addition to fulfilling requirements of 40 CFR part 112, this SPCC Plan is used as a reference for oil storage information and testing records, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to facility inspections, and as a resource during emergency response.

Bromide Mining management has determined that this facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Determination" included in Appendix G of this Plan.

This Plan provides guidance on key actions that Bromide Mining must perform to comply with the SPCC rule, including:

- Complete monthly inspections as outlined in the Inspection, Tests, and Records section of this Plan (Section 3.7) using the inspection checklists included in the Appendices.
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Spill Prevention Procedures section of this Plan (Section 3.8) and document them on the log included in Appendix F.
- If either of the following occurs:
 1. The facility discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event;

Or

¹ U.S. EPA SPCC Guidance for Regional Inspectors, Updated August 2013, Appendix D

2. The facility discharges more than 42 gallons of oil in each of two discharges into or upon the navigable waters of the United States or adjoining shorelines in two spill events occurring within any twelve-month period;

then,

Bromide Mining will submit to the EPA Region 8 Regional Administrator (RA) and the Utah Department of Environmental Quality (UDEQ) the following information (see Section 3.3):

1. Name of the facility and operation area.
 2. Name of the owner or operator of the facility.
 3. Location of the facility and operating area.
 4. Maximum storage or handling capacity of the facility and normal daily throughput
 5. The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements.
 6. Adequate description of the facility, including maps, flow diagrams, and topographical maps.
 7. The cause(s) of such spills, including a failure analysis of the system or subsystem in which the failure occurred.
 8. Additional preventative measures taken or contemplated to minimize the possibility of recurrence.
 9. Such other information as the Regional Administrator may reasonably require pertinent to the SPCC plan or spill event.
- Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments, other than administrative changes discussed above, must be recertified by a Professional Engineer on the certification page in Section 1.2 of this Plan.
 - Amend the SPCC Plan within six (6) months whenever there is a change in facility design, construction, operation, or maintenance that materially affects the facility's spill potential. The revised Plan must be recertified by a Professional Engineer (PE).
 - Review the Plan on an annual basis. Update the Plan to reflect any "administrative changes" that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the Plan review log of Section 1.4 of this Plan, but do not have to be certified by a PE.

Part 1 Plan Administration

1.1 Management Approval and Designated Person (40 CFR 112.7)

This SPCC Plan was developed in accordance with the guidelines provided in 40 CFR Part 112. This SPCC Plan provides specific policies and procedures for the protection and wellbeing of Bromide Mining employees, the public, and the environment. This SPCC Plan has been prepared with the full support and approval of Bromide Mining management, who have the authority to commit necessary resources. The manpower, equipment and materials required to prevent and control oil spills into waters of the United States as detailed in this SPCC Plan will be implemented as herein described. Bromide Mining has implemented this plan and will amend it as necessary with respect to facility expansion, modification, or improvement.

It is believed this SPCC plan meets applicable State and local requirements for spill prevention, control and countermeasures.

Authorized Representative:

Signature: _____ **Title:** _____

Date: _____

The facility has designated a person to be accountable for spill prevention, spill mitigation and reporting to [all](#) facility management and applicable authorities. The designated individual is listed on the cover page of this SPCC Plan.

1.2 Professional Engineer Certification (40 CFR 112.3(d))

I hereby certify and attest that I am familiar with the requirements of 40 CFR Part 112. I, or my agent, have visited and examined the facility. To the best of my knowledge and belief, the information contained in this plan is true, complete, and accurate. I attest that this plan has been prepared in accordance with good engineering practices including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112. Procedures for required inspections and testing have been established. It is my opinion that this SPCC plan is adequate for this facility.

This certification in no way relieves the owner or operator of the facility of his/her duty to prepare and fully implement this SPCC Plan in accordance with the requirements of 40 CFR part 112. This plan is valid only to the extent that the facility owner maintains, tests, and inspects equipment, containment, and other devices as prescribed in this plan.

Date: _____

Seal

Name: Blaine Zwahlen

Company: Engineering and Environmental Services, Inc.

Signed: _____

State Registration #: 175632

All update that are added to this document was done by the duly appointed General Manager and has including four additional sites that will have less than a 1300 gallons site. This areas do not require an Engineer as they all will contain less lubricants and fuels as per 40 CFR112. But will be included and examined as per the requirements of the SPCC Plan.

All maps and plans and tank type and sizes will be recorded in this document as per lay out of the SPCC plan. This will include the four additional areas that will also be covered.

- Bromide mine workshop lubricant storage tank.
- Bromide mine lay down generators and compressor storage tank.
- Har-El mine laydown generator and compressor storage tank.
- Harel Mill Lay down generator and compressor Storage tank.

This areas will contain less than the prescribed amounts of feul or lubricants and there for exempted due to the quantity from 40 CFR 112 for and professional engineer to examine the tanks and the area.

1.3 Location of SPCC Plan (40 CFR 112.3(e))

A copy of the SPCC plan will be kept at the Bromide Mining facility in the main office and will be available to regulatory agencies upon request.

1.4 Plan Review (40 CFR 112.3 and 112.5)

The Spill Prevention Control and Countermeasure (SPCC) Plan shall be reviewed and, if necessary, amended should any of the following occur:

1. Discharge of 1,000 gallons of oil into or upon the navigable waters (includes wetlands and storm sewer systems) of the United States or adjoining shorelines in a single spill event.
2. Discharge more than 42 gallons of oil in each of two discharges into or upon the navigable waters of the United States or adjoining shorelines in two spill events occurring within any twelve-month period.
3. Change in the facility design, construction, operation or maintenance which materially affects the facilities potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shorelines.

Major amendments to the SPCC plan meeting one or more of the above criteria shall be reviewed and certified by a Registered Professional Engineer. Each amendment of the SPCC plan shall also result in a complete review and evaluation of the SPCC plan. Minor amendments such as changing names of facility personnel, changing phone numbers or updating the list of facility contacts will not require certification by a professional engineer.

A complete review and evaluation of the SPCC plan shall be performed at least once every five years from the most recent certification date. Should there be no changes, documentation of this review shall be affixed to the SPCC plan. The following form should be completed to document all SPCC reviews.

SPCC Review Documentation

Company Review

Review Date: 10/30/2015

Signature: _____

- Comments: Up Date included the mine site (operations) and was completed by Shane Scott the duly appointed manager and representative of Bromide Mining.
- The areas that have been added to this plan is the underground equipment workshop that contains less than 1000 Gallons of lubricant or oils.
- The second area double wall fuel storage at the to lay down area containing less than 1000 gallons of diesel.
- The third area is the Harel mine containing less than a 1000 Gallons of fuel.
- The fourth and final and area is at the Har-El Mill containing less than a thousand Gallons of fuel.

Review Date: _____

Signature: _____

Comments: _____

Review Date: _____

Signature: _____

Comments: _____

1.5 Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational (40 CFR 112.7)

It is believed all necessary SPCC facilities, procedures, methods and equipment are in operation at this facility with following considerations:

- Signs should be installed at all bulk-oil unloading areas (at fuel tanks, and lube oil tanks) to remind delivery drivers to be properly disconnected prior to leaving the site. These signs will be installed within 90 days of management approval of this SPCC plan.
- Tank 1 (Clear ULSD) needs to have secondary containment. This containment will be a poly-lined earthen bermed area. This should be completed within 90 days of management approval of this SPCC plan.
- A small earthen berm will be installed along the east fence line near the loading/unloading area to provide secondary containment for loading/unloading activities. This berm should be installed within 90 days of management approval of this SPCC plan.
- Diesel storage Tank 2 should be re-painted to provide better corrosion protection.

1.6 Cross-Reference with SPCC Provisions (40 CFR 112.7)

The following table references SPCC regulations in 40 CFR Part 112 with corresponding sections in this SPCC plan:

Table 1.6 Regulatory Cross Reference Table

| Regulatory Section in 40 CFR Part 112 | Description of Required Information | Bromide Mining SPCC Plan Format |
|---|---|---------------------------------|
| 112.3 (d) | Professional Engineering Stamp | 1.2 |
| 112.4 | SPCC Plan Amendment by Regional Administrator | 1.4 |
| 112.5 | SPCC Plan Amendment by owner/operator | 1.4 |
| 112.7 – General Requirements for SPCC Plans | | |
| 112.7 (a)(1) | Discussion of facility's conformance with Part 112 | All Plan Sections |
| 112.7 (a)(2) | Compliance with applicable portions of Part 112 | All Plan Sections |
| 112.7 (a)(3) | Description of Physical Layout and Facility Diagram | 2.1, 3.2, Appendix J |
| 112.7(a)(3)(i) | Type of oil in each container and its storage capacity | 4.2 |
| 112.7(a)(3)(ii) | Discharge prevention measures | Part 3 |
| 112.7(a)(3)(iii) | Discharge and drainage controls | 3.4, 4.1 |
| 112.7(a)(3)(iv) | Countermeasures for discharge discovery, response and cleanup | Part 5 |
| 112.7(a)(3)(v) | Disposal methods for recovered materials | 5.3 |
| 112.7(a)(3)(vi) | Contact list and phone numbers | Appendix H |
| 112.7(a)(4) | Discharge reporting procedures | 3.3, 5.4 |
| 112.7(a)(5) | Discharge response procedures | Part 5 |
| 112.7(b) | Prediction of direction, rate of flow and total quantity discharged from each type of major equipment failure | 2.2, 3.4, 4.1 |
| 112.7(c) | Description of secondary containment and/or diversionary structures | 3.5 |
| 112.7(d) | Explanation why secondary containment structures are not | 3.6 |

| | | |
|---|--|-----------------|
| | practicable | |
| 112.7(d)(1) | Oil Spill Contingency Plan per 40 CFR Part 109 | N/A |
| 112.7(d)(2) | Written commitment of manpower, equipment and materials for response to discharge | N/A |
| 112.7(e) | Inspections, tests and records | 3.7 |
| 112.7(f) | Personnel, training and discharge prevention procedures | 3.8 |
| 112.7(g) | Security | 3.9 |
| 112.7(h) | Facility tank truck loading/unloading rack | 3.10 |
| 112.7(i) | Brittle fracture failure analysis | 3.11 |
| 112.7(j) | Discussion of conformance with applicable State standards | 3.12 |
| 112.8 – SPCC Plan Requirements for Onshore Facilities (excluding production facilities) | | |
| 112.8(b) | Facility Drainage | 4.1 |
| 112.8 (c) – Bulk Storage Containers | | |
| 112.8(c)(1) | Bulk storage containers – compatibility with materials in storage | 4.2.1 |
| 112.8(c)(2) | Bulk storage containers - secondary containment | 3.5, 4.2.2 |
| 112.8(c)(3) | Bulk storage containers – drainage of storm water from secondary containment areas | 4.3, 4.2.3, 3.5 |
| 112.8(c)(4) | Completely buried tanks – corrosion protection and leak testing | 4.2.4 |
| 112.8(c)(5) | Partially buried tanks – corrosion protection | 4.2.5 |
| 112.8(c)(6) | Aboveground containers – integrity testing | 3.7, 4.2.6 |
| 112.8(c)(7) | Internal heating coils – leakage control | 4.2.7 |
| 112.8(c)(8) | Container liquid level sensing devices – overfill protection | 4.2.8 |
| 112.8(c)(9) | Effluent treatment facilities – observation | 4.2.9 |
| 112.8(c)(10) | Correction of visible discharges | 4.2.10, Part 5 |
| 112.8(c)(11) | Mobile or portable oil storage containers – positioning to prevent discharge and secondary containment | 4.2.11 |
| 112.8(d) – Facility transfer operations, pumping, and facility process | | |
| 112.8(d)(1) | Corrosion protection for buried piping | 4.3.1 |
| 112.8(d)(2) | Proper handling of terminal connection at transfer point | 4.3.2 |
| 112.8(d)(3) | Pipe supports | 4.3.3 |
| 112.8(d)(4) | Inspection and testing of aboveground piping, valves and appurtenances | 4.3.4, 3.7 |
| 112.8(d)(5) | Warning to protect aboveground piping or oil transfer operations from vehicular traffic | 4.3.5 |
| 112.12 – SPCC Plan Requirements for Onshore (Seed Oil) Facilities | | |
| 112.12(b) | Facility Drainage | 4.1 |
| 112.12 (c) – Bulk Storage Containers | | |
| 112.12(c)(1) | Bulk storage containers – compatibility with materials in storage | 4.2.1 |
| 112.12(c)(2) | Bulk storage containers - secondary containment | 3.5, 4.2.2 |
| 112.12(c)(3) | Bulk storage containers – drainage of storm water from secondary containment areas | 4.3, 4.2.3, 3.5 |
| 112.12(c)(4) | Completely buried tanks – corrosion protection and leak testing | 4.2.4 |
| 112.12(c)(5) | Partially buried tanks – corrosion protection | 4.2.5 |
| 112.12(c)(6) | Aboveground containers – integrity testing | 3.7, 4.2.6 |
| 112.12(c)(7) | Internal heating coils – leakage control | 4.2.7 |
| 112.12(c)(8) | Container liquid level sensing devices – overfill protection | 4.2.8 |
| 112.12(c)(9) | Effluent treatment facilities – observation | 4.2.9 |
| 112.12(c)(10) | Correction of visible discharges | 4.2.10, Part 5 |
| 112.12(c)(11) | Mobile or portable oil storage containers – positioning to | 4.2.11 |

| | | |
|-----------------|--|------------|
| | prevent discharge and secondary containment | |
| 112.20 | Requirement to develop Facility Response Plan | N/A |
| 112.21 | Requirement to conduct facility response training and drills | N/A |
| 112. Appendix C | Substantial Harm Criteria Certification Form | Appendix G |

Part 2 General Facility Information

2.1 Facility Description (40 CFR 112.7(a)(3))

Bromide mining operates an equipment yard and maintenance shop in Hanksville, Utah. At this property are several oil storage tanks. Tanks 1 and 2 proved clear and dyed diesel for company vehicles and heavy equipment. On occasion dyed diesel is loaded onto a tanker truck and transported to Bromides' mine operation. Tanks 3 and 4 contain used oil that is generated during vehicle maintenance. The used oil is transported off site for use as on-spec burner fuel/heating oil. Storage tanks and associated secondary containment areas are described in this plan.

The site is located in a commercial area of Hanksville, Utah. The oil tanks are all within a secured, fenced area within the property. The drive and access areas are all dirt roads. Storm water drainage is generally within the property, but also flows in a NE direction outside the property.

The nearest navigable water to this facility is believed to be the Fremont River (located about .27 miles north of the Bromide property) and a tributary canal (located about .16 miles east of the Bromide property).

A. Facility Address, and Telephone

Bromide Mining – Hanksville
28 East 100 North
Hanksville, Utah 84734
435-542-2801

B. Facility Owner and Operator, Address, and Telephone

Bromide Mining – Hanksville
28 East 100 North
Hanksville, Utah 84734
435-542-2801

C. Facility Geographic Location Description

Approximate Facility Coordinates (Storage Tank Area):
Latitude: 38.37245 North
Longitude: -110.710856 West

D. Facility Geographic Location Description Operations Mine site.

Approximate Facility Coordinates (Storage Tank Area):
Latitude: 38.3.935' North
Longitude: -110.47.565' West

2.2 Evaluation of Discharge Potential

Bromide Mining has minimized the potential for any release of oil to the surrounding areas with the use of secondary containment, implementation of a facility, tank and equipment inspection program, and a training program designed to educate employees in spill prevention. While experience has proven that the potential for equipment failure is low there still remains a chance for material to be released onto the property. This section addresses the spill potential for the facility.

The areas of spill potential are as follows:

- A. Storage tanks and associated piping and equipment.
- B. Truck loading/unloading of bulk oil products such as diesel fuel and/or used oil.
- C. Vehicle fueling.

- A. The most likely discharge scenario from tanks is due to overfilling a tank or from a valve being left open or from a leaking tank. Piping failure could also cause a release.

A release from a storage tank would flow into secondary containment. At this facility secondary containment for storage tanks and associated equipment is by poly-lined, bermed areas. These containment areas are further described in this plan in Section 3.5 and Appendix B.

A release outside of containment would likely flow northeast across dirt drive areas.

- B. The most likely discharge scenarios during bulk oil loading/unloading include overfilling a tank, having an unloading hose disconnect or break during unloading or from opening the wrong valve on the delivery truck. For bulk-oil loading/unloading it is anticipated that the delivery driver will detect a spill or problem and respond by shutting down the flow within 30 seconds. At 200 gal/min, a 30 second spill would release about 100 gallons.

An earthen berm has been installed along the east side of the fenced area where the tanks are located. This berm will provide secondary containment for truck loading/unloading activities near the storage tanks.

- C. Company vehicles can be fueled from Tank 1. A discharge is possible from vehicle fueling operations. A spill would flow onto the dirt area near the tank. Likely discharge scenarios would be from driver error, overfilling a fuel tank or from a hose rupture. It is anticipated a person fueling their vehicle will detect a problem and shut off flow within 30 seconds. At 20 gpm a 30 second release would discharge about 10 gallons.

Table 2.2 lists the predicted failure, flow direction, flow rate and containment methods for potential release points:

Table 2.2 Potential Discharge Situations at Bromide Mining

| Source | Type of Failure | Volume (gal.) | Rate (gal./hr) | Direction of Flow | Containment |
|-----------------------------------|--|---------------------------------|-------------------------------------|--|--|
| Storage Tanks | Tank overfill, tank rupture, piping or valve failure | 10,000 1,000 1,000 595 | 24,000 (based on a 400 gpm rate) | Within poly-lined secondary containment. Outside of containment flow would be northeast across the dirt drive areas. Surrounding property is dirt covered with weeds and slopes northeast. | Poly-lined, bermed containment. |
| Truck bulk-fuel loading/unloading | Hose failure, equipment failure, valve leak, driver error | 200 | 12,000 (200 gpm) | Onto dirt area next to storage tanks. Ground slopes northeast towards bermed area within the fenced storage tank yard. | Earthen berm along the east fence line around the storage tanks. |
| Vehicle Fueling | Fuel tank overfill, piping or valve failure, drive off with dispenser in fuel tank | 10 | 1,200 (20 gpm) | Onto dirt area next to storage tanks. Ground slopes northeast towards bermed area within the fenced storage tank yard. | Earthen berm along the east fence line around the storage tanks. |

The property surrounding the Bromide Mining facility is mostly weed-covered dirt that slopes slightly to the northeast. Approximately .16 miles east of the property is an intermittent drainage channel that flows north towards the Fremont River (the Fremont River is about .27 miles north of the Bromide property). In the event of extreme rainfall storm water near the property could possibly flow into this drainage ditch. The drainage ditch and Fremont River are considered the nearest navigable waters for this site.

Table 2.2 Potential Discharge Situations at Bromide Mine (Operations)

| Source | Type of Failure | Volume (gal.) | Rate (gal./hr) | Direction of Flow | Containment |
|---|---|----------------------|----------------------------------|--|--|
| Bromide laydown Storage Tanks Aggreko double wall Z99126-015 | Tank overfill, tank rupture, piping or valve failure | 1092 1,000 100 | 200 (based on a 100 gpm rate) | Aggreko double wall safety portable tank. Ground slop Easterly flow towards over gravel into garvel bermed | Earthen berm along the east line around the storage tanks. |
| Harel Laydown Storage Tanks Aggreko Z99126-015 | Hose failure, equipment failure, valve leak, driver error | 1092 1000 100 | 100 gpm) | Aggreko double wall safety portable tank. Ground slop Easterly flow towards over gravel into garvel bermed | Earthen berm along the east line around the storage tanks. |

| | | | | | |
|--|--|-------------------------------|-------------------|--|---|
| Vehicle Fueling | Fuel tank overfill, piping or valve failure, drive off with dispenser in fuel tank | 2000 1000 100 | 1,200 (20 gpm) | Ground slop Easterly flow towards over gravel into garvel bermed . | Earthen berm along the east fence line around the storage tanks. |
| Harel Laydown Storage Tanks Aggreko double steel wall Z99126-015 | Hose failure, equipment failure, valve leak, driver error | 1092 1000 100 | 100 gpm) | Aggreko double wall safety portable tank. Ground slop Easterly flow towards over gravel into garvel bermed | Earthen berm along the east fence line around the storage tanks.. |
| Bromide work shop Area | Oil drum storage Four Eagle low profile secondary Pallets | 4 per pallet. 55 gal drums | 55/ gal | Aggreko double wall safety portable tank. Ground slop Easterly flow towards over gravel into garvel bermed | Earthen berm along the east line around the storage tanks |

2.2.1 SPILL HISTORY**A. Spill Events within Twelve Months Prior to the Effective Date of this Part**

There have been no reportable spill events within the twelve month prior to the effective date of this SPCC plan.

B. Written Description of Spills, Corrective Action Taken, and Plans for Prevention Recurrence

The following table should be used to summarize spills or discharges, corrective actions taken and plans for preventing a recurrence:

| Description of Discharge | Corrective Actions Taken | Plans for Preventing Recurrence |
|--------------------------|--------------------------|---------------------------------|
| | | |
| | | |
| | | |
| | | |

Part 3 Discharge Prevention – General SPCC Provisions

The following measures are implemented to prevent oil discharges during the handling, use, or transfer of oil products at the facility. Oil-handling employees will be trained in the proper implementation of these measures.

3.1 Compliance with Applicable Requirements (40 CFR 112.7(a)(2))

This facility uses poly-lined containment and earthen containment areas to provide secondary containment for storage tanks and associated piping. The facility does not have a truck rack, but has designated areas for loading/unloading bulk oil. Earthen-bermed areas and site topography offer secondary containment for loading/unloading activities. It is believed containment at this facility provides environmental protection equivalent to the requirements under 112.8(b)(3) to use ponds, lagoons, or catchment basins to retain oil at the facility in the event of an uncontrolled discharge.

For the horizontal tanks under 30,000-gallon capacity, a leak from one of these tanks would be easily detected. Integrity testing of tanks will be accomplished by performing monthly and annual tank inspections. Inspections and certain additional actions to ensure the containment and detection of leaks, is also considered by EPA to provide equivalent environmental protection concerning integrity testing².

3.2 Facility Layout Diagram (40 CFR 112.7(a)(3))

Drawings attached in Appendix I show the general layout of the facility with storage tank locations, loading/unloading area, drainage direction, drainage points, etc.

2. Federal Register Vol. 67, No. 137 / Wednesday, July 17, 2002 / Page 47120 for EPA's rationale for integrity testing of small shop-built tanks for which all sides are visible.

3.3 Spill Reporting (40 CFR 112.7(a)(4))

Spills of oil into or upon the navigable waters (including wetlands and municipal storm water systems) of the United States or adjoining shorelines will be reported **IMMEDIATELY** by the person responsible for spill prevention or the alternate qualified individual (see Cover Page of this plan) to the following:

| | |
|-------------------------------|-------------------|
| Shane Scott, Facility Manager | 305-812-8312 cell |
|-------------------------------|-------------------|

Alternate Bromide Mining Facility Contacts:

| | |
|--------------|-------------------|
| Jody Squires | 775-304-7344 cell |
|--------------|-------------------|

| | |
|----------------|-------------------|
| Taylor Shumway | 423-210-1741 cell |
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| Division of Oil, Gas and Mining UTAH | 801- 538-5340 |
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|-------------------------------------|--------------|
| U. S. Coast Guard, Washington, D.C. | 800-424-8802 |
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|----------------------------------|--------------|
| National Response Center, 24-hr. | 202-267-2675 |
|----------------------------------|--------------|

State of Utah Department of Environmental Quality

Environmental Response and Remediation

Department of Emergency Management

24-hour

801-536-4123

P.O. Box 144840

168 North 1950 West

Salt Lake City, Utah 84114-4840

The verbal spill report shall include the following:

1. The name of the person making the report and their job title.
2. The name, phone number and address of the facility.
3. Time and date of the discharge.
4. Identity of the petroleum oil discharged.
5. Approximate quantity discharged.
6. Location and source of discharge.
7. Cause and circumstances of the discharge.
8. Description of all affected media (soil, pavement, waterway, etc.)
9. Existing and potential hazards, including whether or not an evacuation may be needed.
10. Personal injuries or casualties, if any.
11. Corrective action being taken and an appropriate timetable to control, contain and clean up the discharge.
12. Name(s) and telephone number(s) of individual(s) who discovered the discharge.
13. Identity of the personnel currently at the site of the discharge.

14. Other unique or unusual circumstances.
15. Other government agencies that have been notified or will be notified.

It is recommended that all oral contacts with government agencies in connection with spills be noted in writing, including the name of the person contacted, agency, time and date of call, and a brief summary of the discussion.

Should the facility incur a spill in excess of 1,000 gallons in a single event or have two reportable spill³ events within any twelve month period, the facility shall submit to its U.S. EPA Regional Administrator within 60 days from the time the facility became aware of the spill, the following:

10. Name of the facility
11. Name of the owner or operator of the facility
12. Location of the facility
13. Maximum storage or handling capacity of the facility and normal daily throughput
14. The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements
15. Adequate description of the facility, including maps, flow diagrams, and topographical maps
16. The cause(s) of such spills, including a failure analysis of the system or subsystem in which the failure occurred
17. Additional preventative measures taken or contemplated to minimize the possibility of recurrence
18. Such other information as the Regional Administrator may reasonably require pertinent to the SPCC plan or spill event

This information will be submitted to the following EPA Regional Administrator (Region 8):

U.S. Environmental Protection Agency
1595 Wynkoop St.
Denver, Colorado 80202-1129

303-312-6312

This information will also be provided to the State (see address above).

3. Discharge more than 42 gallons of oil in each of two discharges into or upon the navigable waters of the United States or adjoining shorelines in two spill events occurring within any twelve-month period

3.4 Potential Discharge Volumes and Direction of Flow (40 CFR 112.7(b))

Table 2.2, above in Section 2.2, lists discharge volumes and direction of flow for potential discharge points at the facility.

3.5 Containment and Diversionary Structures (40 CFR 112.7(c))

The facility is designed to prevent, contain and/or divert oil discharge from reaching a navigable watercourse by having a combination of these systems in place:

- Containment with adequate capacity and sufficiently impervious to contain spilled oil.
- Earthen bermed areas with absorbent dirt materials.

Secondary Containment (40 CFR 112.7 (c)(1))

Oil storage tanks are all within poly-lined secondary containment structures. Containment structures are capable of holding the contents of the largest tank with an additional containment volume available to contain a 25-year, 24-hour worst case precipitation event. Displacement from other tanks in the containment area is also accounted for (if necessary).

For bulk-fuel and used oil loading/unloading there is not an unloading rack, but areas near the respective tanks have been designated for loading/unloading. For bulk-fuel loading/unloading it is anticipated that the driver or operator will detect a spill or problem and respond by shutting down the flow within 30 seconds. At 200 gal/min unloading, a 30 second spill would release about 100 gallons. This amount will be collected contained within the earthen berm area east of the loading/unloading area. Proper clean up as discussed in Section 5 would be required if a release occurs during loading/unloading operations.

For vehicle and equipment fueling it is anticipated a person fueling their vehicle will detect a problem and shut of flow within 30 seconds. At 20 gpm a 30 second release would discharge about 10 gallons. This amount will be absorbed dirt in the vicinity of the fueling area. Proper clean up as discussed in Section 5 would be required if a release occurs during loading/unloading operations.

Secondary containment calculations are detailed in Appendix B.

Drainage Control (40 CFR 112.8 (b))

The following drainage controls and measures are in place at this facility:

Drainage from diked storage areas/secondary containment (40 CFR 112.8 (b)(1))

There are no drains or drainage valves in the tank containment areas at this facility. Evaporation is the main method for removing water from a containment area. If water is manually removed by pumping or by vacuum truck the water will first be inspected for any signs of oil. The person removing the water will document the inspection of the water with the use of the Drainage Discharge Report Form in Appendix E.

Valves used on diked area storage (40 CFR 112.8 (b)(2))

There are no flapper-type valves of any kind installed to drain containment areas.

Plant drainage systems from undiked areas (40 CFR 112.8 (b)(3))

Drainage from undiked areas near the storage tanks flows mainly northeast into low-points within the property. The terrain outside the property slopes slightly northeast across weed-covered dirt areas.

Final discharge of drainage (40 CFR 112.8 (b)(4))

Drainage from the property outside of the tank farm is occasional only and is not controlled or monitored.

Facility Drainage Systems and Equipment (40 CFR 112.8 (b)(5))

There are no storm water retention basins or drainage systems in place to control drainage from the property.

The site plans in Appendix I show the general drainage plan for the facility.

3.6 Practicability of Secondary Containment (40 CFR 112.7(d))

Secondary containment has been deemed practical for storage tanks at this facility.

3.7 Inspections, Tests and Records (40 CFR 112.7(e))

It is the responsibility of facility operating personnel to ensure that facility inspections occur daily as a part of regular operations. Formal tank and facility inspections occur on a monthly and annual basis (see forms in Appendices C and D). All inspection records will be maintained and kept on file for a minimum of three years at the facility or in the corporate offices.

Table 3.7 shows the inspections performed, required frequency, and type of documentation that is used:

Table 3.7. Routine Inspections and Training for SPCC Compliance

| Type | Frequency | Forms/Records |
|-----------------------------------|---|---|
| Daily Visual Equipment Inspection | Daily (when facility is open) | None (if problems are noted, use Detailed Tank Inspection) |
| Monthly Facility Inspection | Monthly | Monthly Facility Inspection Form (Appendix D) |
| Monthly Tank Inspection | Monthly | Monthly Tank Inspection Form (Appendix C) |
| Annual Tank Inspection | Annual | Annual Tank Inspection Form (Appendix C) |
| New Employee Training | As Needed | SPCC Training/Meeting Form (Section 3.8 and Appendix F) |
| Annual SPCC Training | Annual | SPCC Training/Meeting Form (Section 3.8 and Appendix F) |
| Tank Integrity Testing | Visual Monthly and Annual Tank Inspections by owners. | Monthly and Annual Tank Inspection Forms (Appendix C) |

General Inspection

General Facility Inspection, including tanks, piping, valves, secondary containment, drainage, unloading areas, security, etc. Bromide Mining personnel will conduct these inspections when they are at the facility. Any leaks or potential problems will be corrected as soon as possible.

Monthly Inspection

Storage tanks, piping, pumps, oil containers, secondary containment and facility security will be formally inspected on a Monthly basis. Inspection forms include unique tank and facility inspection forms for this facility as well as a general Bromide Mining Monthly SPCC inspection form that is completed each month online. Copies of the monthly inspection forms are attached in Appendices C and D. Records of the monthly inspections will be kept by Bromide Mining. Any deficiencies or problems will be reported immediately to Bromide Mining management. Such problems will be corrected as soon as is feasible.

Annual Inspection

Storage tanks will be inspected on an annual basis. One of the Annual Tank Inspection forms in Appendix C will be used to document this inspection.

As Necessary

Storm Water Transfers. Before any water is removed from a secondary containment area the water will be inspected for any visible oil contamination. The person in charge of removing the water will complete a record of this inspection and transfer. A copy of the inspection form is included in Appendix E. This record will be kept by Bromide Mining.

Training Records. A record will be kept by Bromide Mining of all training relating to the SPCC plan. A copy of the log to record training events is included in Appendix F. Other appropriate training records such as outside training courses related to the SPCC plan should also be kept by Bromide Mining.

All records must be kept and maintained for a minimum period of three years.

Tank Integrity Testing

For the horizontal tanks under 30,000-gallon capacity, a leak from one of these tanks would be easily detected. Integrity testing of tanks will be accomplished by performing monthly and annual tank inspections. Inspections and certain additional actions to ensure the containment and detection of leaks, is also considered by EPA to provide equivalent environmental protection concerning integrity testing⁴.

4. Federal Register Vol. 67, No. 137 / Wednesday, July 17, 2002 / Page 47120 for EPA's rational for integrity testing of small shop-built tanks for which all sides are visible.

3.8 Personnel Training and Discharge Prevention Procedures (40 CFR 112.7(f))

Appropriate Bromide Mining employees will be trained as follows:

Personnel Training and Instruction, 40 CFC 112.7 (f)(1) and (3)

New Bromide Mining personnel who will be involved with tank operations will be trained so they understand the contents of this SPCC plan. An outline of the new-hire training follows below. Appropriate Bromide Mining employees will receive annual review training of the SPCC plan. The same outline as that used for the new-hire will be used for the review training.

Any time there is a spill event or failure or if there are newly developed precautionary spill prevention measures to be put in place for the facility then all appropriate Bromide Mining employees will be informed. Any necessary training will be conducted in conjunction with the spill event or the new spill prevention measures.

The SPCC Training Outline is as follows:

SPCC Training Outline

The following outline is for training all new employees and is used as a guideline for annual SPCC training.

1. Introduction to the SPCC plan.
 - a. Explain the purpose of the plan.
 - b. Review contents of the plan.
 - c. Discuss the facility areas included in the Bromide Mining SPCC plan.
 - d. Review the emergency contacts for the facility.
2. Review the spill history of the site and explain the measures taken to prevent future occurrences. Discuss any recent discharge occurrences and review prevention measures to avoid a reoccurrence.
3. Review the potential for spills at the facility.
4. Discussion of the secondary containment and its purpose.
5. Review the storage tanks.
 - a. Define which tanks are in service and in what service.
 - b. Train employees on how to read the associated tank gauges or take stick-gauge readings.
6. Discuss how transfer operations are done at the Bromide Mining facility.
7. Review the operation of bulk-fuel loading/unloading.

8. Train employees on how to conduct and complete Facility Inspections and how to complete the Inspection forms.
 - a. What to look for, i.e. leaks, oil stains, water in containment, oil in containment, valves improperly shut or open, etc.
 - b. How to report problems.
 - c. What to do with completed inspection forms.
9. Review the facility security and the employees' responsibility as it relates to maintaining this security.
10. Review the SPCC spill reporting procedures and the company emergency response procedures.
11. Discuss any recently developed or implemented precautionary measures or procedures.

40 CFC 112.7 (f)(2) Designated Person

A person has been designated to be accountable for discharge prevention. This person will be responsible to report to management concerning SPCC compliance. The designated person accountable for spill prevention will be responsible to ensure SPCC training is conducted (see cover page for designated person).

3.9 Security (40 CFR 112.7(g))

The Bromide Mining Plant is open generally during day-light hours, five to six days a week. The following security measures are in place:

3.9.1 Security Description

The entire oil-storage tank area is surrounded by chain-link fence that is topped with barbed wire. The access gate is locked shut at closing. In addition main valves on the fuel tanks can be locked closed when not in use. It is believed the fencing around the tanks will provide adequate security for the oil tanks at this site.

3.9.2 Flow valves locked

When not in use the main flow valves for tanks will be locked close.

3.9.3 Starter controls locked

Pump starter controls are locked out when not in use and when no persons are on site.

3.9.4 Pipeline unloading connections securely capped

All connections, hoses, and pipelines are securely capped when not in service, including empty connections maintained as standby or extension apparatus. Out-of-service pipelines will be evacuated of their contents and blinded or capped.

3.9.5 Lighting adequate to detect spills

Lights are located so that areas around the storage tanks receive adequate illumination. Lighting is also adequate to detect spills during nighttime hours and to deter vandalism.

3.10 Tank Truck Loading/Unloading Rack Requirements (40 CFR 112.7 (h))

3.10.1 Secondary Containment (40 CFR 112.7 (h)(1))

For loading and/or unloading bulk oil there are designated areas near the respective tanks. Surrounding earthen berm areas will provide secondary containment for a release during loading/unloading.

For loading/unloading it is anticipated that the delivery driver will detect a spill or problem and respond by shutting down flow within 30 seconds. At 200 gal/min unloading, a 30 second spill would release about 100 gallons. This amount will be absorbed by dirt in the vicinity of the tanks. Proper clean up as discussed in Section 5 would be required if a release occurs during bulk loading/unloading operations.

3.10.1.1 Unloading Procedures (40 CFR 112.7 (h)(2)(3))

The following requirements and procedures are in place for loading/unloading bulk fuel or used oil at this Bromide Mining facility:

Loading/unloading procedures meet U.S. Department of Transportation (DOT) regulations. Bromide Mining requires all drivers to comply with DOT regulations in 49 CFR Part 177 and facility standard operating procedures. All drivers must be authorized and certified by Bromide Mining to load/unload products.

The driver must be present and attentive at all times during loading/unloading.

Loading/unloading procedures are shown in Table 3.10

Table 3.10. Truck Unloading Procedures

1) Prior to Loading/Unloading

- Set parking brakes.
- Do not allow drivers to remain in vehicles while performing loading or unloading.
- Clean nonessential equipment and objects from the loading area.
- Keep dome covers closed, except when unloading to allow tank to vent.
- Thoroughly examine vehicles to ensure closure of all out-flowing valves.
- Check and verify the receiving tank inventory.
- Compare receiving tank inventory against the planned transfer quantity to avoid overfilling.

2) During Unloading

- Begin flow slowly.
- Observe outlets during unloading to detect potential leakage during transit.
- When filling a tank the liquid level of the tank must be continuously monitored to ensure the tank is not overfilled.
- In the event that any leakage is observed, cease unloading immediately and take corrective action.

3) After Loading/Unloading

- Check liquid levels for compartments by gauge and visual inspection.
 - All loading hoses and valves are disengaged.
 - Return all pumps, valves, and hoses to their out-of-service positions.
 - Close all hatches tightly.
 - Close internal safety valves.
 - Check for leaks or drips from all connections. Correct any leaks before leaving the dock area.
-

3.10.2 Warning or barrier system for vehicles. 40 CFR 112.7 (h)(2)

A warning sign is posted in view of the unloading hose connection to deter vehicular departure before complete disconnect of transfer lines has occurred.

3.10.3 Vehicles examined for lowermost drainage outlets before leaving. 40 CFR 112.7 (h)(3)

Upon completion of loading/unloading operations, the lowermost drainage outlets are inspected for leaks. Observed leaks must be corrected before the vehicle leaves the loading/unloading area.

3.11 Brittle Fracture Evaluation (40 CFR 112.7 (i))

Brittle-fracture analysis, in accordance with API 653, will not be required since the tanks at this facility are small shop-welded tanks (40 CFR Part 112.7(i)). The shell thickness of all tanks at this facility is less than one-half inch. As discussed in the American Petroleum Institute (API) Standard 653 Tank Inspection, Repair, Alteration, and Reconstruction (API-653), brittle fracture is not a concern for tanks that have a shell thickness of less than one-half inch. This is the extent of the brittle fracture evaluation for the tanks at this facility.

3.12 Conformance with State and Local Applicable Requirements (40 CFR 112.7 (j))

It is believed that this plan conforms with applicable State and Federal requirements, regulations and guidelines for effective discharge prevention and containment procedures associated with aboveground storage and handling of oil.

The State of Utah Department of Environmental Quality (UDEQ) requires spill reporting as described in this SPCC plan.

Part 4 Discharge Prevention – SPCC Provisions for Onshore Facilities

4.1 Facility Drainage (40 CFR 112.8(b))

All Bromide Mining Plant areas that are involved in the management and storage of oil are within containment structures. There are no exposed storm drains or floor drains within the tank containment areas.

The property around the oil-storage tanks, outside of containment, generally slopes northeast across weed-covered dirt areas.

Additional drainage control information is detailed above in Section 3.5.

4.2 Bulk Storage Containers (40 CFR 112.8(c))

4.2.1 Construction (40 CFR 112.8(c)(1))

Bromide Mining's storage consists of aboveground storage tanks. A current list of tanks with corresponding tank data is attached in Appendix A. All oil storage tanks are constructed of welded steel.

Products stored in tanks consist of diesel fuel, used oil, or similar petroleum products. Tank materials-of-construction are compatible with the tank contents. Steel tanks have exterior coatings that are in fair to good condition. Tanks are regularly inspected and are subjected to integrity testing using appropriate methods described in Section 3.7. Testing records are maintained by the designated person in charge of SPCC compliance (see cover page for designated person).

All AST tanks are subject to daily visual inspections during working hours to ensure their integrity. Any leaks are immediately detected and reported to management.

4.2.2 Secondary Containment (40 CFR 112.8(c)(2))

Secondary containment for the storage tanks is detailed above in Section 3.5.

4.2.3 Drainage of Diked Areas (40 CFR 112.8(c)(3))

As discussed in Section 3.5, there are no drains or drainage valves in the tank containment areas at this facility. Evaporation is the main method for removing water from a containment area. If water is manually removed by pumping or by vacuum truck the water will first be inspected for any signs of oil. The person removing the water will document the inspection of the water with the use of the Drainage Discharge Report Form in Appendix E.

4.2.4 Corrosion Protection (40 CFR 112.8(c)(4))

There are no underground storage tanks at this location. ASTs are protected against corrosion by being elevated above the ground and by protective coatings.

4.2.5 Partially Buried Tanks (40 CFR 112.8(c)(5))

There are no buried or partially buried storage tanks located at this Bromide Mining facility.

4.2.6 Inspections and Test (40 CFR 112.8(c)(6))

Tanks are inspected as detailed above in Section 3.7.

4.2.7 Heating Coils (40 CFR 112.8(c)(7))

There are no heated tanks at this facility.

4.2.8 Overfill Protection (40 CFR 112.8(c)(8))

Tanks rely on inventory records and manual stick-gauging for overfill protection. The liquid level in a tank is gauged prior to putting material in a tank. The person filling the tank must closely monitor the liquid level in the tank to avoid overfilling the tank. Tank 1 has a level-gauge on the end of the tank. Tank 2 must be stick-gauged. Tanks 3 and 4 are small ground-level tanks. The liquid level in these tanks can be observed through vents or hatches.

4.2.9 Effluent Treatment Facilities (40 CFR 112.8(c)(9))

This Bromide Mining site does not have a monitoring system for effluent precipitation from the property.

4.2.10 Visible Discharges (40 CFR 112.8(c)(10))

Daily inspections include visual monitoring of tank seams, flanges, gaskets, and bolts. Visible discharges from any container or appurtenance – including seams, gaskets, piping, pumps, valves, and bolts – are quickly corrected upon discovery.

Oil is promptly removed from containment areas and disposed of according to the waste disposal method described in Part 5 of this plan.

4.2.11 Mobile and Portable Containers (40 CFR 112.8(c)(11))

Any portable or temporary storage tanks used at the Bromide Mining facility will be properly contained within existing containment structures or will be provided with portable secondary containment such as a steel bin or plastic containment pallet.

4.3 Transfer Operations, Pumping, and In-Plant Processes (40 CFR 112.8(d))

4.3.1 Buried Piping

There are no underground pipes at this facility.

4.3.2 Not in Service and Standby Connections

Bromide Mining operates with aboveground pipe/hose terminal connections. All unloading terminal valves are kept in the closed position when not in use. If the facility, or any part of the facility, were to be temporarily taken out of service, valve ends and other appropriate locations would be temporarily blind-flanged, capped or plugged. These connections and terminals would remain capped until such time as they were brought back into service.

4.3.3 Pipe Supports

Piping at this facility is minimal, but appears adequately supported and appears to be adequately designed to allow for expansion and contraction and to minimize corrosion.

4.3.4 Aboveground Equipment and Piping Inspections

Aboveground valves and pipelines are subject to regular inspections. Items subject to inspections include, but are not limited to piping, valves, pipe joints, flanges, etc. Daily observations are made during regular shift work and monthly inspections are documented using the standard forms included in Appendices C and D.

4.3.5 Protection of Aboveground Piping and Equipment

Aboveground tanks, piping and equipment are located within the perimeter of respective containment areas or within protected areas. The containment areas provide protection for the tanks, piping and equipment.

Part 5 Discharge Response (40 CFR 112.7 (a)(3)(iv))

This section describes the response and cleanup procedures in the event of an oil discharge. The uncontrolled discharge of oil to groundwater, surface water, or soil is prohibited by state and federal laws. Immediate action must be taken to control, contain, and recover discharged product.

In general, the following steps are taken:

1. Eliminate potential spark sources
2. If possible and safe to do so, identify and shut down source of the discharge to stop the flow
3. Contain the discharge with sorbents, berms, trenches, sandbags, or other material
4. Contact the Facility Manager or his/her alternate
5. Contact regulatory authorities and the response organization as necessary
6. Collect and dispose of recovered products according to regulation

For the purpose of establishing appropriate response procedures, this SPCC Plan classifies discharges as either “minor” or “major,” depending on the volume and characteristics of the material released.

A list of Emergency Contacts is provided in Appendix H.

5.1 Response to a Minor Discharge

A “minor” discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- a. The quantity of product discharged is small (e.g., may involve less than 25 gallons of oil)
- b. Discharged material is easily stopped and controlled at the time of the discharge
- c. Discharge is localized near the source
- d. Discharged material is not likely to reach water
- e. There is little risk to human health or safety
- f. There is little risk of fire or explosion.

Minor discharges can usually be cleaned up by Bromide Mining personnel. The following guidelines apply:

- Immediately notify the Facility Manager (or area Manager).
- Under the direction of the Facility Manager (or area Manager), contain the discharge with discharge response materials and equipment. Place discharge debris in properly labeled waste containers.
- The Facility Manager (or area Manager) will document the discharge (see Section 2.2.1.B above).
- If the discharge involves more than 25 gallons of oil, the Facility Manager will contact regulatory authorities to report the release (see section 5.4).

5.2 Response to a Major Discharge

A “major” discharge is defined as one that cannot be safely controlled or cleaned up by facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- The discharged material enters water;
- The discharge requires special equipment or training to clean up;
- The discharged material poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply:

1. All workers must immediately evacuate the discharge site and move to areas at a safe distance from the discharge.
2. The Facility Manager must be notified. The Facility Manager, or his/her designee, has authority to initiate notification and response. Certain notifications are dependent on the circumstances and type of discharge.
3. Any able employee must call for medical assistance if workers are injured or in case of a fire.
4. The Facility Manager must immediately contact the National Response Center (**888-424-8802**) and Utah DEQ 24-hour communications center at 801-536-4123.
5. The Facility Manager must document all calls to regulatory authorities.
6. The Bromide Mining Facility Manager coordinates cleanup and obtains assistance from a cleanup contractor(s) or other response organization as necessary.

If the Facility Manager is not available at the time of the discharge, then the next highest person in seniority assumes responsibility for contacting appropriate regulators and coordinating response activities.

5.3 Waste Disposal (40 CFR 112.7 (a)(3)(v))

Wastes resulting from a minor discharge response will be containerized in impervious bags, drums, or buckets. The facility manager will characterize the waste for proper disposal and ensure that it is removed from the facility by a licensed waste hauler.

Wastes resulting from a major discharge response will be removed and disposed of by Bromide Mining or by a cleanup contractor.

5.4 Discharge Notification

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (**1-800-424-8802**). The Center is staffed 24 hours a day.

Discharge notification procedures are detailed above in Section 3.3 and Section 5.2 of this plan. A Discharge Notification Form is included in Appendix H.

5.5 Cleanup Contractors and Equipment Suppliers

Due to secondary containment oil discharges will be contained within the property; however, appropriate clean up will be required any time oil is spilled onto the dirt or earthen-bermed areas. Typically this will involve coordination by the facility manager who will direct the clean up work. Bromide Mining has adequate equipment and man power to conduct most clean ups so outside contract help will not be required except in unusual circumstances.

Appendices

| | |
|------------|---|
| Appendix A | Storage Tank Data |
| Appendix B | Secondary Containment Calculations |
| Appendix C | Monthly and Annual Storage Tank Inspection Forms |
| Appendix D | Monthly Facility Inspection Form |
| Appendix E | Drainage Discharge Report Form |
| Appendix F | SPCC Training/Meeting Form |
| Appendix G | Certification of the Applicability of the Substantial Harm Criteria Checklist |
| Appendix H | Emergency Contacts, Phone Numbers and Discharge Notification Form |
| Appendix I | Site Map, Site Plan and SPCC Drawings |

Appendix A
Storage Tank Data

Appendix B

Secondary Containment Calculations

Appendix C
Monthly Storage Tank Inspection Form
Annual Storage Tank Inspection Form

Appendix D
Monthly Facility Inspection Form

Appendix E
Drainage Discharge Report Form

Appendix F
SPCC Training/Meeting Form

SPCC TRAINING/MEETING RECORD

Conducted by: _____ Date: _____

Attendees: _____

SPCC Elements:

- | | |
|--|---|
| <input type="checkbox"/> Inspections (Type, Frequency) | <input type="checkbox"/> Facility Storage (Quantity, Locations) |
| <input type="checkbox"/> Drainage | <input type="checkbox"/> Spill Control Procedures |
| <input type="checkbox"/> Site Security | <input type="checkbox"/> Spill Control Equipment |
| <input type="checkbox"/> Bulk Transfer Operations | <input type="checkbox"/> Fueling Operations |
| <input type="checkbox"/> Record Keeping | <input type="checkbox"/> Housekeeping |
| <input type="checkbox"/> Equipment Maintenance | <input type="checkbox"/> Emergency Contacts |

Spill Response Drill Conducted ? ☐ Yes ☐ No

Scenario Description: _____

Facility Management Approval: _____

Appendix G

Certification of the Applicability of the Substantial Harm Criteria Checklist

**CERTIFICATION OF THE APPLICABILITY
OF THE SUBSTANTIAL HARM CRITERIA CHECKLIST**

FACILITY NAME: Bromide Mining – Hanksville

FACILITY ADDRESS: 28 East 100 North, Hanksville, Utah 84734

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gal.?
☐ Yes ☒ No
2. Does the facility have a total oil storage capacity greater than or equal to 1 million gal., and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?
☐ Yes ☒ No
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gal., and is the facility located at a distance (as calculated using the formula in Attachment C-III, Attachment C, 40 CFR Part 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Environments" (Section 10, Attachment E, 40 CFR Part 112 for availability) and the applicable Area Contingency Plan.
☐ Yes ☒ No
4. Does the facility have a total oil storage capacity greater than or equal to 1 million gal., and is the facility located at a distance (as calculated using the appropriate formula (Attachment C-III, Attachment C, 40 CFR Part 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake ?
☐ Yes ☒ No
5. Does the facility have a total oil storage capacity greater than or equal to 1 million gal. and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gal. within the last 5 years?
☐ Yes ☒ No

CERTIFICATION

I certify that, under penalty of law, I have personally examined and am familiar with the information submitted in this document and that, based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Name (please type or print)

Signature

Title

Date

Appendix H

Emergency Contacts and Phone Numbers

| | |
|-------------------------------|--|
| Shane Scott, Facility Manager | 305-812-8312 cell 435-542-2801 office |
|-------------------------------|--|

Alternate Bromide Mining Facility Contacts:

| | |
|----------------|-------------------|
| Jody Squires | 775-304-7344 cell |
| Taylor Shumway | 423-210-1741 cell |
| Bert Jansen | 435-542-1795 Home |

| | |
|--------------------------------------|---------------|
| Division of Oil, Gas and Mining UTAH | 801- 538-5340 |
|--------------------------------------|---------------|

| | |
|-------------------------------------|--------------|
| U. S. Coast Guard, Washington, D.C. | 800-424-8802 |
| National Response Center, 24-hr. | 202-267-2675 |

State of Utah Department of Environmental Quality
Environmental Response and Remediation
Department of Emergency Management
24-hour
P.O. Box 144840
168 North 1950 West
Salt Lake City, Utah 84114-4840

801-536-4123

U.S. Environmental Protection Agency
(Region 8 States Only)
1595 Wynkoop St.
Denver, Colorado 80202-1129

303-312-6312
800-227-8917

Region 8 Emergency Response Spill Report Hotline:

800-227-8914

Fire Department, emergency

911

Wayne County Sheriff, emergency

911

Medical Emergency

911

Hanksville Volunteer Fire Department
Fire Chief Jeff Kiteley

435-609-6774 cell

Wayne County Sheriff

435-836-1308

Additional Emergency Contacts are listed in the Discharge Notification Form (see following section of this SPCC plan)

Appendix H

Discharge Notification Form

Appendix I

Site Map, Site Plan and SPCC Drawings